

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP,	)	
BI-LEVEL PAP, AND MECHANICAL	)	Master Docket: Misc. No. 21-1230
VENTILATOR PRODUCTS	)	
LITIGATION,	)	MDL No. 3014
	)	
This Document Relates to: All Actions	)	

**JOINT MOTION FOR ENTRY OF SECOND AMENDED INTERIM PRESERVATION  
ORDER APPLICABLE TO TRILOGY DEVICES**

Defendants Philips RS North America LLC f/k/a Respironics, Inc. (“Philips RS”); Koninklijke Philips N.V.; Philips North America LLC; Philips Holding USA, Inc.; and Philips RS North America Holding Corporation (collectively, “Defendants”) and Plaintiffs, by and through Co-Lead Counsel (collectively, the “Parties”), jointly submit this [Proposed] Second Amended Interim Preservation Order (Applicable to Trilogy Devices) (the “Trilogy Order”) for approval and entry by the Court. This Proposed Trilogy Order sets forth the Parties’ preservation obligations with respect to Trilogy Devices only. A redline of the Second Amended Interim Preservation Order Applicable to Trilogy Devices is attached hereto as Exhibit 1.

WHEREFORE, the Parties respectfully request that the Court enter the attached Order.

Dated: June 14, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed via the Court's CM/ECF system on this 14th day of June 2023 and is available for download by all counsel of record.

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